UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

SCOTT MARTIN, on behalf of himself)
and all others similarly situated,)
)
Plaintiff,)
)
V.) Case No. 3:14-cv-00083-wmc
)
LG ELECTRONICS U.S.A., INC.,) Hon. William M. Conley
LG ELECTRONICS, INC.,)
HITACHI-LG DATA STORAGE, INC.,) Magistrate Judge Stephen L. Crocker
CYBERLINK.COM CORP.,)
CYBERLINK CORP., and)
JOHN DOES 1 through 20,)
)
Defendants.)

AGREED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER, OR OTHERWISE PLEAD

Defendants Cyberlink Corp. and Cyberlink.com Corp. (collectively, "Cyberlink"), by its undersigned counsel, respectfully move this Court for an agreed upon extension of time up to and including June 4, 2014, to move, answer, or otherwise plead in response to Plaintiff's Complaint. In support thereof, Cyberlink states as follows:

- 1. Plaintiff filed his Complaint on February 8, 2014.
- Cyberlink waived service of summons on March 10, 2014, extending the deadline for Cyberlink to file and serve an answer or motion under Rule 12 to April 21, 2014.
- 3. On March 18 and 19, 2014, this Court reset the deadline for Cyberlink to file and serve an answer or motion under Rule 12 to May 27, 2014.

4. By this Motion, Cyberlink seeks an extension of time up to and including June 4,

2014, to move, answer, or otherwise plead in response to Plaintiff's Complaint.

5. In an effort to streamline litigation, counsel for Cyberlink and counsel for Plaintiff

have engaged to provide informal discovery and have initiated discussions concerning

matters pertinent to Plaintiff's claims.

6. Counsel for Plaintiff has no objection to the requested extension of time, provided

that no prejudice results in the event that time is needed for Plaintiff to conduct

extensive formal, as opposed to informal, discovery.

7. No previous extensions of time have been requested by Cyberlink.

8. This Motion is not brought for purposes of delay or for any other improper purposes.

WHEREFORE, for the foregoing reasons, Defendants Cyberlink Corp. and

Cyberlink.com Corp. respectfully request that this Court enter an order granting it an agreed

upon extension of time up to and including June 4, 2014, to move, answer, or otherwise plead in

response to Plaintiff's Complaint.

Dated: April 8, 2014

Respectfully submitted,

Cyberlink Corp. and Cyberlink.com Corp.

By: _____/s/ Joseph C. Wylie II_

One of Their Attorneys

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CERTIFICATE OF SERVICE

Joseph C. Wylie II, an attorney, hereby certifies that a true and correct copy of the above and foregoing **Agreed Motion for Extension of Time to Move, Answer, or Otherwise Plead** was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) on this 18th day of April 2014 to the following:

Frank J. Jablonski Progressive Law Group, LLC 354 West Main Street Madison, WI 53703 (608) 258-8511

Elizabeth Roberson-Young Ilan Chorowsky Progressive Law Group, LLC 1 N. LaSalle Street, Suite 2255 Chicago, IL 60602 (312) 787-2712

/s/ Joseph C. Wylie II
Joseph C. Wylie II